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August 28, 2014

Hon. James. L. Cott  
U.S. Magistrate Judge  
Southern District of New York  
500 Pearl Street  
NY NY

VIA ECF

Re: USA v. Michael Lucarelli  
Case No. 14 MJ 1878 (JLC)

Dear Judge Cott:

I am an attorney representing the defendant in the above matter. Under the terms of the personal recognizance bond issued by the court on August 26, 2014, certain conditions were to be met by the defendant by September 2, 2014: to wit -

- (1) \$50,000.00 in cash or property as collateral; and
- (2) Signatures of three financially responsible;

The defendant has already identified the three (3) co-signatories for the bond: his parents who reside in Wisconsin and his brother Stephen Lucarelli who resides in Alabama. My office has already sent the documents to them for signature. I have already received the titles and registrations for the defendant's car and boat to use as part of the \$50,000 collateral. I am endeavoring to get an appraisal to determine their current value. I have also discussed with AUSA Brian Blais the possible use of part of the accounts currently seized by government. The defendant has already surrendered his passport and appeared yesterday at Pre-Trial Services for drug-testing as ordered by the court. Therefore, the above conditions are the only two remaining conditions.

Due to the upcoming Labor Day holiday and as all three co-signatories live out-of-state, it will be difficult to meet the current deadline of September 2, 2014. The defendant therefore requests that the court extend the deadline for meeting the above two bond conditions up to and including Friday, September 5, 2014. AUSA Brian Blais has advised me that his office has no objection to the request.

Thank you for your attention in this matter.

Very truly yours,

OSCAR MICHELEN (OM5199)

SO ORDERED:

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U.S.M.J.